



Project
Telephone Company
TOTAL TELECOMMUNICATIONS

Filed Electronically Via ECFS 2/25/2009

EB DOCKET NO. 06-36

February 25, 2009

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Reference: EB-06-TC-060
Certification of CPNI Filing of Project Telephone Company
499 Filer ID 801588

Dear Ms. Dortch:

Enclosed is the CPNI compliance certificate of Project Telephone Company (499 Filer ID 801588) in response to the Public Notice issued by the Federal Communication Commission's Enforcement Bureau on January 30, 2006 and FCC 07-22 released on April 2, 2007.

Please contact me with any questions or concerns.

Sincerely,

Shawn Hanson
CEO
Phone: 406-783-2200
E-mail: shawn.hanson@nemont.coop

cc: Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com

Project Telephone Company
CPNI Certification and Statement
February 25, 2009

HIGHWAY 13 SOUTH ■ P.O. BOX 600 ■ SCOBEE, MONTANA 59263-0600
(406) 783-5659 ■ 1-800-275-6002 ■ FAX (406) 783-5283



Project
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TOTAL TELECOMMUNICATIONS

Before the

Federal Communications Commission
Washington, D.C. 20554

CPNI Compliance Certification)
As Required by FCC Enforcement)
Bureau, DA 06-223)

EB-06-TC-060, EB Docket No. 06-36
Project Telephone Company
499 Filer ID 801588

**PROJECT TELEPHONE COMPANY
CERTIFICATION OF CPNI COMPLIANCE
FOR THE 2008 CALENDAR YEAR**

1. Project Telephone Company ("PTC") (499 Filer ID 801588) is submitting this compliance certificate in response to the Public Notice issued by the FCC's Enforcement Bureau on January 30, 2006 (DA 06-223), and Report and Order FCC 07-22, pursuant to section 64.2009(e) of the Federal Communication Commission's rules.
2. I am the CEO for PTC. I make this certification from my personal knowledge of the CPNI procedures and policies of PTC.
3. PTC's use of CPNI is and will be done in strict compliance with the principles and requirements outlined in Subtitle U of the Commission's rules. Accordingly, PTC's personnel are trained in the proper use of CPNI for such purposes. Because CPNI will be used for mass marketing purposes, PTC has established the appropriate safeguards for this type of use of CPNI data. These safeguards include documentation of this policy in company procedures and training of company personnel with regard to use of CPNI data.
4. On behalf of PTC, I certify that, pursuant to the Commission's rules, PTC has established procedures that are adequate to ensure compliance with CPNI rules currently in effect and the statements contained in this filing are correct.

Shawn Hanson

Shawn Hanson
CEO

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CERTIFICATION OF CPNI COMPLIANCE
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OPERATING PROCEDURES STATEMENT

1. Customer account prominently displays “**Opt Out**” so that employees viewing customer information can readily identify customers opting to restrict use of their CPNI. When calls are received from customers with this preferred treatment, employees ask for customer permission to access account information.
2. PTC uses “opt-out approval” as the method to obtain customer consent to use, disclose, or permit access to the customer’s CPNI. Customers may “opt-out” at any time.
3. Notice regarding customer CPNI rights and PTC’s duty to protect CPNI will be provided to all new and existing customers in the next printed telephone directory issued by PTC. In addition, customers will be notified periodically, by one or more of the means listed: bill stuffers, bill messages, separate mailings, and/or Nemont Today.
4. Employees are trained on the proper use and/or disclosure of CPNI. Additionally procedures are documented and readily available to all employees.
5. Access to CPNI data is limited to employees and/or entities with proper authorization as allowed under Commission rules. All employees and/or entities with such access operate under policies and/or contract requiring nondisclosure of confidential information.
6. All marketing campaigns and materials are reviewed by the CPNI Compliance Officer or a designated representative. This will include any use of CPNI data used in any given marketing effort. The proper safeguards are in place should PTC use CPNI data to target market to customers.

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7. Improper use or disclosure of CPNI is subject to PTC's work rules and disciplinary policies as outlined in its employee handbook. The employee handbook is readily accessible by all employees.

8. Valid photo identification is required when customers come into any of our retail store locations requesting assistance/access to any account information.

9. Release of any CPNI information requested by the customer via a telephone call is prohibited, with the following exceptions: the requesting individual provides the password of record; or, the information is sent via United States Postal Service (USPS) mail to the customer's address of record. The customer is also referred to the e-bill site.

10. PTC does not currently, and has no plans to provide CPNI to a third party for the purposes of marketing.

11. Customer initiated changes in passwords or addresses or security questions used as authentication result in a generic notification to the customer using the address of record consistent with FCC rules.

12. On-line access to CPNI is compliant with the FCC password requirements.



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**PROJECT TELEPHONE COMPANY
FOR THE 2008 CALENDAR YEAR**

CUSTOMER COMPLAINTS

1. During the 2008 calendar year, Nemont received no customer complaints related to CPNI.

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PRETEXTING ACTIVITIES

1. During the 2008 calendar year, no pretexting activities were noticed, so no actions were undertaken to address such activities.

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